

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 04-10016-NG
	)	
WALDIR FRANCISCO DEOLIVEIRA	)	
_____	)	

**JOINT MOTION FOR CONTINUANCE AND TO EXCLUDE TIME**

The parties jointly request that the Court continue the Interim Status Conference scheduled for April 1, 2004 until the Final Status Conference to be held on May 6, 2004 at 2:15pm.

The parties further request that pursuant to 18 U.S.C. §3161 (h)(8)(A), the Court exclude the period of time commencing on April 1, 2004 and ending on May 6, 2004. As grounds therefor, the parties state that the interests of justice are best served by allowing the parties additional time to negotiate a possible plea agreement.

WHEREFORE, the parties respectfully request that the Court continue the status conference until the Final Status Conference to be held on May 6, 2004 at 2:15pm and that pursuant to 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice served by granting the requested continuance and exclusion outweigh the best interest of the public and the defendant in a speedy trial, and, accordingly, grant the continuance as requested above and exclude the above period in computing the time within which trial must commence under 18 U.S.C. §3161.

WALDIR FRANCISCO DEOLIVEIRA  
By His Attorney

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By:

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DATED: April 1, 2004